

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNITED STATES OF AMERICA, et al.,
ex rel. CALEB HERNANDEZ and JASON
WHALEY, Relators

CASE No. 2:16-cv-00432-JRG

Plaintiffs,

v.

TEAM HEALTH HOLDINGS INC., et al.,

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
MOTION TO INTERVENE AND TO RESPOND TO OR OTHERWISE ADDRESS
MOTION TO UNSEAL DOCUMENTS**

Defendants Team Health Holdings, Inc., Team Finance, L.L.C., Team Health, Inc., AmeriTeam Services L.L.C., HCFS Health Care Financial Services, L.L.C. and Quantum Plus, L.L.C. (“Defendants”) or “Team Health”) request the Court extend the deadline by ten (10) days to respond to Loren Adler’s Motion to Intervene for the Limited Purpose of Challenging the Court’s Sealing Orders, filed on December 14, 2021 as Docket Number 440, and to respond to or otherwise address Loren Adler’s Motion to Unseal Documents on Public Docket, filed on December 14, 2021 as Docket Number 442. The current deadline to respond to these motions is December 28, 2021, and the new deadline would be January 7, 2022. This request is not made for purposes of delay, but in light of the upcoming holidays and so that justice can be done. Defendants have conferred with counsel for Loren Adler and they are unopposed to this request.

WHEREFORE, Defendants request that the deadline to respond to the Motion to Intervene for the Limited Purpose of Challenging the Court’s Sealing Orders and to respond to or otherwise

address Loren Adler's Motion to Unseal Documents on Public Docket be extended to January 7, 2022.

Dated: December 16, 2021

Respectfully submitted,

By: /s/ Michael Brett Johnson

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Counsel for Defendants Team Health Holdings Inc., Team Finance, L.L.C., Team Health Inc., AmeriTeam Services, L.L.C., HCFS Health Care Financial Services, L.L.C., and Quantum Plus, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2021, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

/s/Michael Brett Johnson
Michael Brett Johnson

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7(h), Counsel for Defendants met and conferred on December 15th, 2021 with Craig Briskin, counsel for Mr. Loren Adler, and Mr. Adler is unopposed to Defendants' Motion to Extend the Deadlines to Respond to Loren Adler's Motion to Intervene for the Limited Purpose of Challenging the Court's Sealing Orders and to Respond to or Otherwise Address the Motion to Unseal Documents on Public Docket.

/s/Michael Brett Johnson
Michael Brett Johnson